



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

January 11, 2022

BY ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Michael Avenatti, 19 Cr. 374 (JMF)*

Dear Judge Furman:

The Government respectfully requests, on behalf of the parties, that the Court enter the attached protective order regarding certain jury records sought by the defendant from the Jury Administrator of the Southern District of New York, pursuant to the Court's order dated January 11, 2022 (Dkt. No. 228). The parties have conferred, and understand, consistent with the attached proposed protective order, that the defendant may use relevant jury records obtained by counsel for the defendant in previous cases, including *United States v. Delowar Hossain*, 19 Cr. 606 (SHS), and will seek from the Jury Administrator only the balance of the records not already in defense counsel's possession sought in the defendant's motion dated January 11, 2022 (Dkt. No. 223).

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By:

s/
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cc: Robert M. Baum, Esq. (by ECF)
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